September 27, 2012

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: In the Matter of: Nominations for Universal Service Administrative Company Board of Directors, CC Docket Nos. 96-45, 97-21

Dear Ms. Dortch:

Pursuant to the Public Notice issued September 13, 2012 seeking nominations for various positions on the Board of Directors of the Universal Service Administrative Company ("USAC"), the Independent Telephone & Telecommunications Alliance ("ITTA") hereby nominates Genevieve Morelli. Ms. Morelli is being nominated to fill the position on the Board as the representative for incumbent local exchange carriers ("ILECs"), other than Bell Operating Companies, with annual operating revenues in excess of \$40 million.

ITTA's members are mid-size ILECs that provide a broad range of high quality voice, broadband, Internet, and video services to 20 million access lines in 44 states. ITTA members comprise the industry segment Ms. Morelli is being nominated to represent, as required by 54.703(c)(1) of the Commission's rules.

Ms. Morelli has worked with and represented telecommunications service providers over a thirty-year career in the communications industry. During that time, she has developed significant expertise and knowledge of the industry. Ms. Morelli currently serves as President of ITTA and has held this position since March 2011.

¹ Wireline Competition Bureau Seeks Nominations for Nine Board Member Positions on the Universal Service Administrative Company Board of Directors, DA 12-1469 (rel. Sept. 13, 2012).

² ITTA's membership includes CenturyLink, Cincinnati Bell, Comporium Communications, Consolidated Communications, FairPoint Communications, Hargray Communications, HickoryTech Communications, SureWest Communications, and TDS Telecom.

Ms. Marlene H. Dortch September 27, 2012 Page 2

ITTA believes Ms. Morelli would be an excellent representative of mid-size ILECs and a valuable addition to the USAC Board. Thus, ITTA respectfully requests that Ms. Morelli hold the seat designated for non-Bell Operating Company ILECs with annual operating revenues in excess of \$40 million.

Sincerely,

/s/ Matthew Dosch

Matthew Dosch Chairman ITTA

Attachment cc: Erica Myers Charles Tyler

GENEVIEVE MORELLI

202-898-1519

gmorelli@itta.us

PROFESSIONAL EXPERIENCE

INDEPENDENT TELEPHONE & TELECOMMUNICATIONS ALLIANCE

President

Washington, DC March 2011 - Present

 Represents the interests of ITTA's mid-size communications service provider members on a broad range of federal regulatory, legislative and litigation matters.

KELLEY DRYE & WARREN LLP

Partner Of Counsel Washington, DC July 2002 - Feb.2011 April 2000 - July 2002

 Practice specialized in the representation of communications service providers in a wide variety of federal and state regulatory, appellate litigation, and transactional matters. Frequent speaker on communications issues at leading business and policy forums.

OWEST COMMUNICATIONS INTERNATIONAL

Senior Vice President - Government Affairs

Arlington, VA

Feb. 1999 - Feb. 2000

Directed the federal and state regulatory and legislative programs for global multimedia communications company.
Responsible for final approval of all regulatory filings.

COMPETITIVE TELECOMMUNICATIONS ASSOCIATION

Executive Vice President & General Counsel Vice President & General Counsel General Counsel

Washington, DC Sept. 1995 – Feb. 1999 Feb. 1991 – Feb. 1995 Mar. 1990 – Feb. 1991

 Directed the association's federal and state advocacy programs; developed and administered all outside legal and regulatory resources. Oversaw all legal and contractual matters involving the association. Served as acting president for approximately one year.

MCI COMMUNICATIONS CORPORATION

Senior Regulatory Attorney

Washington, DC

Aug. 1998 - Mar. 1990

 Counseled the nation's second largest competitive communications provider on a variety of federal and state legal and regulatory issues.

ALLNET COMMUNICATIONS SERVICES, INC.

Deputy General Counsel

Washington, DC

Mar. 1987 - Aug. 1988

 Provided representation on state and federal business and regulatory issues for Michigan-based communications service provider.

NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS

Deputy Assistant General Counsel

Washington, DC

May 1983 - Mar. 1987

 Acted as counsel for the national association representing state utility regulators in the 50 states and the District of Columbia.

PROFESSIONAL ACTIVITIES

Participated as a keynote speaker, panelist or moderator at over 50 industry conferences, seminars, and trade shows

North American Numbering Council, former member, Board of Directors

North American Billing and Collection, Inc., former member, Board of Directors

Center for Public Utilities, New Mexico State University, former member, Advisory Council

EDUCATION

GEORGE WASHINGTON UNIVERSITY NATIONAL LAW CENTER Washington, DC

Juris Doctor

NEW YORK UNIVERSITY

New York, NY

Bachelor of Arts, cum laude